

EXHIBIT A

From: [Eli Mosley](#)
To: [Jessica Phillips](#); [Michael Bloch](#); hoppe.ecf@vawd.uscourts.gov; [Yotam Barkai](#)
Subject: Sines v. Kessler Kline Discovery and Fine
Date: Monday, December 30, 2019 5:19:38 PM

Hello,

I've sent out my discovery obligations as well as the court ordered fine today and attached the information below.

For the fine, I was sent the court order on Tuesday, but wasn't able to check email until Thursday when I asked the Plaintiffs for the information on who to make the money order out to. I received a reply today and immediately went to the bank and then sent out the money order for \$600 to Integrity for America as per the Plaintiffs instructions using the fastest available speed via mail. The tracking number for money order is USPS # 9505 5103 4261 9364 5927 57, and I have included a picture of the money order that was sent below.

For the discovery obligations, I got them updated, notarized, and sent today to both the courthouse and to the plaintiffs. The originals went to the court. The tracking number for my response to interrogatories and request for documents (as well as the document) is FedEx 779326660014 using overnight shipping. These are attached below as well.

Please let me know if there is anything else needed for me to fulfill my discovery obligations and fine as I believe I have completed all the court and Plaintiffs have asked to the best of my ability.

Lastly, I was wondering if I could get an update from the Plaintiffs on the status of the "Walmart phone" and my new active phone? I have received my old deactivated phone back, but it does not entirely work and my phone service will not let me change to the old phone. Can I perhaps get the tracking number and an update on what is going on with those two phones?

Please let me know if there are any questions or concerns.

Thank you,
Elliott Kline

Elliott Kline
117 Mesa Drive
Sinking Spring, PA, 19608

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

Sines and Others
Vs
Kessler and Others

Defendant Elliott Kline hereby responds to the First Set of Document Requests propounded by plaintiffs.

Request for Production 1.

The only such document used for Unite the Right is the attached "OpOrd" which contained all the information that I communicated to others about the event. This document was a "living document" Google document that was changed and edited over time so I do not have multiple versions of the document.

Request for Production 2.

The same "OpOrd" document described above is the only document used by myself for the planning of Unite the Right.

Request for Production 3.

The same "OpOrd" document described above is the only document used by myself for the planning of Unite the Right. Communications made were done via Discord which I no longer have access to as per my response to Interrogatories.

Request for Production 4.

The same "OpOrd" document described above is the only document used by myself for the planning of Unite the Right.

Request for Production 5.

The same "OpOrd" document described above is the only document used by myself for the planning of Unite the Right. My social media accounts that I used from Jan 1st, 2015 to present have all been banned by their companies and I no longer have access to them. So I cannot produce them. The only social media account I still have access to is Gab which I have turned over the account credentials to the discovery vendor.

Request for Production 6.

The same "OpOrd" document described above is the only document used by myself for the planning of Unite the Right.

Request for Production 7.

The same "OpOrd" document described above is the only document used by myself for the planning of Unite the Right.

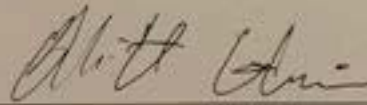
Request for Production 8.

Once I was informed by my original counsel on steps to preserve documents I took the following steps: I listed out all the emails/social media/accounts I had access to and that I could remember. I searched through my emails for any additional account credential information. I searched the Google Drive of my email addresses I used for any documents related to the case. I made sure to keep the phones I used during Unite the Right and after to turn them over for discovery. I did not delete any text messages, emails, posts, or other documents during this time.

I, Elliott Kline, based on reasonable inquiry, that the foregoing answers are true and correct to the best of my knowledge, information and belief. I verify under penalty of perjury that the foregoing is true and correct.

Dated:

12/30/2019

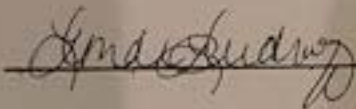


Elliott Kline

Commonwealth of PA
County of Berks

Signed and sworn to before
me on DECEMBER 30, 2019

by ELLIOTT KLINE



COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Linda L. Rudloff, Notary Public
Sinking Spring Boro, Berks County
My Commission Expires 12/31/2022

Elliott Kline
117 Mesa Drive
Sinking Spring, PA, 19608

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

Sines and Others
Vs
Kessler and Others

Defendant Elliott Kline hereby responds to the First Set of Interrogatories propounded by plaintiffs.

In the responses below, Kline responds based upon the information that is currently known to myself. Kline reserves the right to produce or to rely on additional documents or facts subsequently recalled or discovered and to assert additional objections and privileges as necessary.

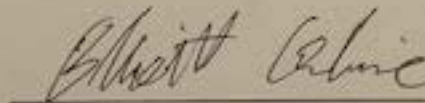
1. To communicate for Unite the Right I primarily used the Discord account that has already been sent to discovery Eli Mosley#5269. You are asking for an 18 digit identifier that I am unsure what that is. The discord account listed above was banned so I no longer can login in to find any sort of code for the account. I also used some or all of the following Twitter accounts that I currently do not have access to because of account deletion/banning by Twitter: @thatelimosley, @notelimosley, @elimosleyie, @eli_mosley_, @sheli_shmosley, @EliMosley, @EliMosleyIsBack, @EliMosleyOH. The Gab account @EliMosley. The following emails deplorabletruth@gmail.com, eli.f.mosley@gmail.com, eli.r.kline@gmail.com, and eli.mosley@identityevropa.com. I do not know the email address that I used for my Facebook account but the name on the account was Eli Mosley. I have given over all the account credentials that I have available. The Twitter, Facebook, and Discord accounts were all banned by their companies so I no longer have access to them or have their credentials. I used burner emails for the Twitter/Facebook accounts so do not know or have access to those emails or accounts. I've searched through all the emails I do have access to in order to find any other information on these accounts but found no additional information.
2. I primarily used the "Charlottesville 2.0" Discord to make all communications about Unite the Right, but we also had one setup that was for the first time we went to Charlottesville. I also communicated in Identity Evropa's discord about

the event. As I previously said, my Discord account has been banned so I no longer have access to login to see the specific names of these servers but I do authorize Discord to provide whatever data is needed for discovery.

3. Most of the people that I communicated with in the Alt Right used pseudonyms to go by, but the people I remember communicating with about the event before, during or after are: Jason Kessler, Richard Spencer, Christopher Cantwell, Andrew Anglin, Azzmador, Nathan Damigo, Matthew Heimbach, Michael Hill, Augustus Invictus, Michael Pelnovich, Dillon Harper, Thomas Rousseau, Erica (don't remember last name but in other court documents) and Patrick Casey.
4. The primary communication device I used before, during and after the event was the 610-406-2229 iPhone that has already been sent in for discovery. I also used a walmart phone after the event for a short period of time and currently have a new cell phone. All three of these phones are currently with the Discovery vendor. The only other Electronic devices I used were laptops owned by other defendants Richard Spencer and Nathan Damigo, but both of those laptops were used very rarely as well as a neighbor's PC (do not recall their name) to print out something that was unrelated to Unite the Right.

I, Elliott Kline, based on reasonable inquiry, that the foregoing answers are true and correct to the best of my knowledge, information and belief. I verify under penalty of perjury that the foregoing is true and correct.

Dated: 12/30/2019



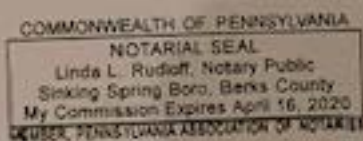
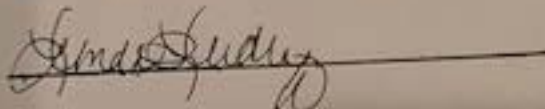
Elliott Kline

Commonwealth of PA
County of Berks

Signed and sworn to before

me on DECEMBER 30, 2019

by ELLIOTT KLINE



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0067964 Office AU #	11-24 1210(8)	PERSONAL MONEY ORDER	6796404467
Remitter: BRUCE KLINE Operator I.D.: u741468			December 30, 2019
PAY TO THE ORDER OF <i>Integrity First for America</i>			
Six hundred dollars and no cents			**\$600.00**
Payee Address: Memo: WELLS FARGO BANK, N.A. 3000 SHILLINGTON PLZ SHILLINGTON, PA 19607 FOR INQUIRIES CALL (480) 394-3122		VOID IF OVER US \$ 600.00 <i>[Signature]</i> Purchaser's Signature	Details on Back

0067964 Office AU #	11-24 1210(8)	PERSONAL MONEY ORDER	SERIAL #: [REDACTED]
Remitter: BRUCE KLINE Purchaser: BRUCE KLINE Purchaser Account: [REDACTED] Operator I.D.: u741468 Funding Source: Electronic Item(s)			ACCOUNT#: [REDACTED]
PAY TO THE ORDER OF			December 30, 2019
Six hundred dollars and no cents			**\$600.00**
Payee Address: Memo: WELLS FARGO BANK, N.A. 3000 SHILLINGTON PLZ SHILLINGTON, PA 19607 FOR INQUIRIES CALL (480) 394-3122		NOTICE TO PURCHASER--IF STOP PAYMENT IS PLACED ON THIS INSTRUMENT, WELLS FARGO BANK MAY IMPOSE A WAITING PERIOD BEFORE ISSUING A REPLACEMENT OR REFUND.	VOID IF OVER US \$ 600.00 NON-NEGOTIABLE
Purchaser Copy			

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